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5 Attorneys for Creditor,  
6 COMMERCIAL CREDIT GROUP INC.

7 **UNITED STATES BANKRUPTCY COURT**  
8 **NORTHERN DISTRICT OF CALIFORNIA, SANTA ROSA DIVISION**

9 In re  
10 KINGSBOROUGH ATLAS TREE  
SURGERY, INC.,  
11 Debtor.

Case No. 25-10088  
Chapter 11

**DECLARATION OF GABRIEL P.  
HERRERA IN SUPPORT OF  
APPLICATION FOR ORDER  
SHORTENING TIME TO HEAR  
MOTION FOR RELIEF FROM THE  
AUTOMATIC STAY PURSUANT TO  
STIPULATION OF THE PARTIES  
REGARDING PERSONAL PROPERTY**

16 I, Gabriel Herrera, declare as follows:

17 1. I am an attorney duly admitted to practice law before this Court. I serve as counsel  
18 for creditor Commercial Credit Group Inc. ("Creditor" or "CCG") in the above-captioned case. I  
19 have personal knowledge of all facts stated herein. If called as a witness, I could and would  
20 competently testify to all matters stated herein unless otherwise specified. I make this declaration  
21 in support of Creditor's application for an order shortening time to hear CCG's motion for relief  
22 from the automatic stay in order to allow Creditor to enforce its state law rights with respect to the  
23 following personal property in which the Debtor seeks to abandon: (a) 2020 Bandit 18XP Chipper  
24 (Doc. 153); (b) 2010 Bandit 19XP Chipper (Doc. 153); (c) 2020 Vermeer 42" Log Grappler (Doc.  
25 153); (d) 2020 Felling Equipment Trailer (Doc. 153); (e) 2010 Vermeer SC292 Stump Grinder (Doc.  
26 153); (f) 2017 Caterpillar 208-D Excavator (Doc. 154); (g) 2017 Rotobec Rotating Grapple  
27 Attachment (Doc. 154); (h) 2019 Vermeer CTX (Doc. 154); and (i) a residential customer list (Doc.  
28 152) (collectively "Personal Property").

1           2.       The docket reflects that on or about June 11, 2025, the Debtor filed three Notices of  
2 Proposed Abandonment of Personal Property, seeking to abandon the Personal Property. The  
3 Notices of Proposed Abandonment are set to be heard on July 1, 2025. The Notices are shown as  
4 Docket Nos. 152-154.

5           3.       On or about June 18, 2025, the Creditor and the Debtor entered into a Stipulation for  
6 Relief from the Automatic Stay. Under the terms of the Stipulation, the parties agreed that CCG  
7 shall have relief from stay to enforce its state law rights with respect to the Personal Property in the  
8 event the Personal Property is abandoned.

9           4.       In addition, I requested that the Debtor stipulate that the hearing on this motion be  
10 shortened given that the abandonment is set to be heard on July 1, 2025. The Debtor, through  
11 counsel, stipulated and agreed that the motion can be heard on shortened time. An order shortening  
12 time, in my opinion, is warranted given that the Debtor intends on abandoning the Personal Property,  
13 the hearing is set on July 1, 2025, and the next hearing date on proper notice would not be until  
14 August 2025.

15           I declare under penalty of perjury under the laws of the State of California that the foregoing  
16 is true and correct.

17           Executed June 20, 2025, at Sacramento, California.

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20           GABRIEL P. HERRERA  
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